

Thomas-Jensen Affirmation

Exhibit # 80

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, *et al.*,

Defendants.

**Declaration of Ahna Minge,
Assistant Commissioner for Budget Services and State Budget Director,
Minnesota Management and Budget**

Ahna Minge declares as follows:

1. I am the Assistant Commissioner for Budget Services and State Budget Director at Minnesota Management and Budget (“MMB”), a position I have held since 2021. As Assistant Commissioner for Budget Services and State Budget Director, I oversee a division that works with the Minnesota Governor’s Office, legislative committees, legislative fiscal staff and state agencies on fiscal policy, program review, performance management and developing and monitoring state agency budgets.

2. I have personal knowledge of the matters set forth below or have knowledge of the matters based on my review of information and records gathered by my staff.

3. I am providing this declaration to explain some of the adverse impacts of the threatened and actual suspensions and impoundments of federal grant funding resulting from: (1) President Trump’s Executive Orders; (2) the memorandum “Temporary Pause of

Agency Grant, Loan, and Other Financial Assistance Programs,” Matthew J. Vaeth, Acting Director of the Office of Management and Budget (January 28, 2025) (“OMB Memo”); and (3) other federal agency actions.

4. In Minnesota, MMB is responsible for managing state finances, payroll and human resources, and providing systems for daily business operations and information access and analysis for state agencies across Minnesota state government. MMB serves the state government itself, including Minnesota’s Governor, the Minnesota legislature, over 100 state government entities, and over 50,000 state employees. These state entities and employees serve 5.8 million Minnesota residents, 1.3 million of whom are under the age of 18.

5. Federal funding is critical to the state budget, providing over one-third of projected revenues in state fiscal year 2025 (“FY2025”). These revenues support amenities and services impacting every Minnesotan, including our roads, schools, drinking water, electric grid, and health care system.

6. The OMB Memo and other federal actions have threatened federal funding, and specifically federal grants, for many state agencies in Minnesota and will have an immediate impact on significant programs administered by Minnesota state agencies in the 2025 fiscal year. I highlight just a few of the noteworthy federal grants implicated by the OMB Memo:

Federal Grant Assistance Listing Number (ALN)	Federal Award Name	Impacts for Minnesotans	SFY 2025 Estimated Amount
Federal Highway Administration (ALN 20.205)	Federal Highway Administration; Federal Aid Highway Program	This program includes funds to rehabilitate bridges in critical need of repair and improve mobility and access to opportunity.	\$1,319,289,000
Federal Aviation Administration (ALN 20.106)	Airport Improvement Program; Airport Infrastructure Grants	This includes grants for snow removal and deicing equipment at Minnesota's International Falls airport along the Canadian border, and for safety enhancements for a tarmac and taxiway at the Minneapolis St. Paul airport.	\$873,416,000
HUD (ALN 14.327)	Section 8—Contract Administration	This program provides rental assistance for thousands of Minnesotans: The City of Saint Paul's Public Housing Agency alone administers more than 5,000 Section 8 Housing Choice Vouchers.	\$266,000,000
Agriculture (ALN 10.555)	Food & Nutrition Services—Lunch	Preliminary data show the program supported 103,062,282 lunches for 650,000 student participants in 2024. All but two schools in the state participate in the program.	\$244,195,000
Education (ALN 84.010)	Title 1	This program supports fair, equitable and significant education opportunities for thousands of Minnesota children—in Duluth alone (pop. 88,000), seven schools support student learning with Title 1 Part A funding. In 2023-published data, over 900 Minnesota public schools had schoolwide or targeted assistance programs.	\$170,000,000
U.S. Department of Health and Human Services (ALN 93.568)	Low Income Energy Assistance Program	In 2023, this program provided Winter Crisis heating support for 46,996 Minnesota households, in addition to non-crisis support for 133,000 households.	\$148,697,000

HHS (ALN 93.563)	Child Support Enforcement	Next to Medicaid and general education programs, Child Support is the targeted program that touches the most children in the state: in 2023, we collected nearly \$518 million for 214,000 children.	\$135,300,000
USDA (ALN 10.557)	Women, Infants and Children - Food	The program provided an average of \$56.30 of food benefits per person per month for approximately 102,000 Minnesotans in 2024, resulting in fewer infant deaths, more vitamin-rich diets, and improved cognitive outcomes for participants.	\$80,000,000
Agriculture (ALN 10.553)	Food & Nutrition Services-Breakfast	Preliminary data show the program supported 49,413,173 breakfasts for 311,506 student participants in 2024, providing meals of higher nutritional value than average breakfasts outside of school, and boosting alertness throughout the morning for participating students.	\$79,107,000

7. State agencies in Minnesota have currently budgeted for \$22.6 billion in federal revenue in FY 2025, nearly all of which are implicated by the OMB Memo. That equates to roughly \$1.9 billion per month in FY2025.

8. The State of Minnesota expects to receive over \$8 billion through the Infrastructure Investment and Jobs Act (“IIJA”) and the Inflation Reduction Act (“IRA”). These funds support Minnesota’s infrastructure, clean energy and climate goals. These funds are critical to supporting the maintenance and safety of the state’s transportation system, which has projected unmet funding needs of \$15 billion to \$20 billion over the next twenty years.

9. These funds also provide critical resources to supplement the state’s

investment in ensuring residents have access to clean and healthy water by replacing lead service lines. For example, the Lead Service Line Replacement Program provides funding to municipalities and other public water suppliers to remove and replace lead service lines in both public and private spaces. The state combines \$240 million in general funds with \$341 million in IJJA funds awarded through the Drinking Water State Revolving Fund in order to fund this work.

10. The OMB Memo, various Executive Orders, and social media posts and emails from White House and federal agency staff have created day-to-day uncertainty about the availability of federal funds and the operability of reimbursement portals. For example, as reported to me and my staff and reflected in Exhibits A and B:

- the Minnesota Department of Human Services (“MDHS”) was locked out of Medicaid funding on Tuesday, January 28, 2025, delaying a \$408 million draw request until the following day when it reopened;
- the Minnesota Department of Education (“MDE”) was unable to draw down funding related to the federal Payment Management System payment portal (“PMS”) on Tuesday, January 28, 2025;
- the Minnesota Department of Employment and Economic Development was unable to submit requests for reimbursement through PMS on Tuesday, January 28, 2025 and although system access has been restored some cash drawdowns are still outstanding;
- the Minnesota Department of Natural Resources (“DNR”) was unable to access several federal funding streams through the Automated Standard Application for Payments (“ASAP”) portal on Tuesday, January 28, 2025;
- the Public Facilities Authority (“PFA”) could not draw down funding that originated from the IJJA beginning on Wednesday, January 29, 2025 and is still unable to access the portal;
- the Minnesota Pollution Control Agency (“MPCA”) could not access the ASAP portal for any funding stemming from the IRA or the IJJA, even as of Monday, February 3, 2025, as of 3:54 p.m. (See Appendices A and B,

showing the availability of federal funding sources by grant on January 31, 2025, and February 3, 2025, respectively, for MPCA);

- Minnesota Department of Health (“MDH”) staff were unable to log into the federal Grant Solutions portal on Friday, January 31, 2025 and was unable to draw down IJA funding for small communities to treat emerging contaminants through the ASAP portal as late as Tuesday, February 4, 2025; and
- the University of Minnesota was unable to access National Science Foundation (“NSF”) funds over the weekend of February 1 and 2, 2025.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 2/5/2025



Ahna Minge
Assistant Commissioner
Minnesota Management
Budget

EXHIBIT A

EXHIBIT A TO MINGE DECLARATION (MINNESOTA)

APPENDIX A

An email communication from the MPCA indicated that the programs highlighted in pink were unavailable for MPCA fund withdraws in the EPA ASAP system at 3:30PM on Friday, January 31, 2025.

FED AWARD #	GRANT NAME	IJA	SWIFT AP	Start Date	End Date	C
5A00E03425	Air Quality Sensor Database	IRA	R32E164	7/1/2023	6/30/2026	
5D00E03463	Climate Pollution Reduction Grant - Planning	IRA	R32E163	6/1/2023	5/31/2027	
5E00E03864	CPRG - Climate Smart Food Systems	IRA	see below	10/1/2024	9/30/2029	
5T00E03786	IRA Air Monitoring Grant	IRA	R32E198	6/1/2024	5/31/2029	
5U01E03772	IRA Air Quality Sensor Grant	IRA	R32E199	6/1/2024	5/31/2029	
4B00E03218	Brownfield Community Wide	IJA	R32G184	10/1/2022	9/30/2027	
	Brownfield Community Wide	IJA				
4W01E03310	Sec 128(A) Bipartisan Infrastructure	IJA	R32G192	10/1/2023	12/31/2024	
4W02E03310	Sec 128(A) Bipartisan Infrastructure	IJA	R32G202	10/1/2024	9/30/2025	
DE-MS0000076	Consumer Battery Recycling	BIL	R32D214	9/1/2024	8/31/2026	
4U00E03258	P2 Grant	IJA	R32D167	10/1/2022	9/30/2025	
4U84074101	P2 EJ in Communities	IJA	R32D199	2/1/2024	1/31/2026	
4Z00E03483	SWIFR Grant	IJA	R32D189	10/1/2023	9/30/2026	
5Z00E07102	Minnesota Electric School Bus Initiative	IRA	R32	1/1/2025	12/31/2027	
4F00E03272	Hypoxia Task Force	IJA	R32R400	10/1/2022	9/30/2027	
4F00E03295	Hypoxia Task Force	IJA	R32R	1/1/2025	12/31/2030	

EXHIBIT B

EXHIBIT B TO MINGE DECLARATION (MINNESOTA)

APPENDIX B

An email communication from the MPCA indicated that the programs highlighted in orange were unavailable for MPCA fund withdraws in the EPA ASAP system on the afternoon of Monday, February 3, 2025.

Division	SWIFT PROJECT ID	SWIFT AWARD ID	FED AWARD #	GRANT NAME	IUA	SWIFT AP
EA0	R32GT0000000185	R320000185	0P00E03169	ARP PM2.5	ARP	R32E159
EA0	R32GT0000000199	R320000199	5A00E03425	Air Quality Sensor Database	IRA	R32E164
EA0	R32GT0000000198	R320000198	5D00E03463	Climate Pollution Reduction Grant - Planning	IRA	R32E163
EA0	R32GT0000000216	R320000216	5E00E03864	CPRG - Climate Smart Food Systems	IRA	see below
EA0	R32GT0000000220	R320000220	5T00E03786	IRA Air Monitoring Grant	IRA	R32E198
EA0	R32GT0000000219	R320000219	5U01E03772	IRA Air Quality Sensor Grant	IRA	R32E199
2 Remediation	R32GT0000000190	R320000190	4B00E03218	Brownfield Community Wide	IUA	R32G184
1 Remediation	R32GT0000000204	R320000204	4W01E03310	Sec 128(A) Bipartisan Infrastructure	IUA	R32G192
5 Remediation	R32GT0000000222	R320000222	4W02E03310	Sec 128(A) Bipartisan Infrastructure	IUA	R32G202
RMAD	R32GT0000000218	R320000218	DE-MS0000076	Consumer Battery Recycling	BIL	R32D214
2 RMAD	R32GT0000000191	R320000191	4U00E03258	P2 Grant	IUA	R32D167
3 RMAD	R32GT0000000209	R320000209	4U84074101	P2 EJ in Communities	IUA	R32D199
5 RMAD	R32GT0000000201	R320000201	4Z00E03483	SWIFR Grant	IUA	R32D189
7 RMAD	R32GT0000000228	R320000228	5Z00E07102	Minnesota Electric School Bus Initiative	IRA	R32
3 Watershed	R32GT0000000193	R320000193	4F00E03272	Hypoxia Task Force	IUA	R32R400